

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In Re: Ronald S McCandless

Case No. 18-23662
Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust (SN Servicing Corporation, servicer), which holds a Deed of Trust secured by the Debtor's real property at 3732 Spring Falls Court, Ellicott City, Maryland 21042, by and through its attorney, Joshua Welborn, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$62,000.00 for arrearages owed to U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust (SN Servicing Corporation, servicer).

2. The pre-petition arrears owed to U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust (SN Servicing Corporation, servicer) as stated in the Proof of Claim filed herein, are \$107,276.53.

3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust (SN Servicing Corporation, servicer).

4. Pursuant to a previous request from the Court to so advise it and the parties, counsel for the Creditor does not intend to appear in Court regarding this Objection

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively

2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Joshua Welborn, Esq. (Jwel 1-8-19)

Joshua Welborn, Esq.

Attorney for Secured Creditor

Bar No. 29359

McCabe, Weisberg & Conway, LLC

312 Marshall Avenue, Suite 800

Laurel, MD 20707

301-490-1196

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of January, 2019 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Nancy Spencer Grigsby
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J. Michael Broumas
J. Michael Broumas
Broumas Law Group LLC
8370 Court Avenue, Suite 203
Ellicott City, Maryland 21043
michael@broumas.com

I hereby further certify that on the 8th day of January, 2019, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Ronald S McCandless
3732 Springfalls CT
Ellicott City, Maryland 21042
(Via U.S Mail)

/s/ Joshua Welborn, Esq.
Joshua Welborn, Esq.